CORRES. CONTROL INCOMING LTR NO.

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RANCIS, G.E OODWIN, R. EALY, T.J.

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IRBY, W.A. IRKEBO, J. A

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WANSON, E.R VIEBE, J.S.

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Department of Energy

ROCKY FLATS OFFICE P.O. BOX 928 GOLDEN, COLORADO, 80402-0928

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ROCKY FLATS PLANT CORRESPONDENCE CONTROL 91-DOE-4357

Ms. Judy Bruch Rocky Flats Program Unit Colorado Department of Health 4210 East 11th Avenue, Bank Building Denver, Colorado 80220

Dear Ms. Bruch:

Enclosed please find the results of sampling performed at Terminal Pond C-2 on February 26, 1991. These samples were split with the Colorado Department of Health to assess the suitability for discharge of these waters, in accordance with the procedure established pursuant to the Agreement in Principle between our two agencies.

In reviewing these results, we have noted only one parameter of potential concern. This is the result for gross beta activity, measured in our sample at 7.6 +/- 1.5 picoCuries per liter (pCi/l). This result exceeds the gross beta goal qualifier standard for Woman Creek, which has been set by the State of Colorado at 5 pCi/l. The result is, however, considerably less than the corresponding standard for Walnut Creek, which has been set at 19 pCi/l. All other results are within the State goal qualifier standards set for Woman or Walnut Creeks, including specific radionuclides.

We propose to dewater Pond C-2 by discharging it to the diversion ditch around Great Western Reservoir. A water treatment system similar to that located at Pond A-4 is available in a standby mode at Pond C-2, and may be placed into service if ongoing water sampling results indicate a need to do so. Given the results to date, however, we do not plan to treat Pond C-2 water prior to its transfer to Pond B-5. We have discussed this discharge approach with the City of Broomfield and have received their concurrence with our proposal to discharge untreated watered from Pond C-2, so long as State water quality standards are met. We are in the process of seeking approval from the U.S. Environmental Protection Agency, Region VIII for the discharge to the diversion ditch, as such a discharge represents a change from the discharge point for pond C-2 specified in our Plant's National Pollutant Discharge Elimination System permit.

We ask that you review the enclosed results as well as the results of your own sampling and provide your concurrence with the proposal outlined above at your earliest convenience. Please contact us if your results are significantly at variance with ours, or if your results indicate that the water in Pond C-2 may in any way be unsuited for discharge in the manner we propose. Following receipt of your concurrence in this matter, we will of course notify your agency, the U.S. Environmental Protection Agency and local communities prior to actual commencement of transfer of water from Pond C-2.

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Reviewed for Addressee Corres, Control RFP

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We would also like to submit another issue regarding water releases from Pond C-2 for your formal consideration. As we have discussed with you, the owner of Mower Reservoir, Mr. Karl Brauch, has asked that we divert water from C-2 to Mower Reservoir via the Mower Ditch. We ask that you consider this possible transfer in light of the site-specific water quality standards of Woman Creek, given the fact that gross beta levels in the analysis discussed above exceed these standards. The transfer to Mower Reservoir will not involve discharge to Woman Creek. We ask that your agency provide for us an interpretation of the water quality standards that would apply to such a transfer, and whether or not such a transfer would constitute a violation of these standards in light of the attached results. We will not initiate the transfer to Mower Reservoir without first receiving your input on this matter.

If you have any questions or need more information in this matter, please call me or Tom Lukow at 966-4561.

Sincerely,

David P. Simonson Assistant Manager

for Environmental Management

Enclosure

cc (w/Enclosure):

R. Shankland, U.S. EPA Region VIII

S. Nachtrieb, City of Westminster

K. Schnoor, City of Broomfield

K. Brauch

(w/o Enclosure):

T. Lukow, DOE/RFO

J. Rampe, DOE/RFO

✓ J. Kersh, EG&G Rocky Flats